

**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP
LEED ENVIRONMENTAL, INC.**

**124 Deborah Drive
Reading, PA 19610
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to Sandy Bron
- tell ENTACT we want
list or highlighting
of lots not fully
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4/7/00

April 7, 2000

Telecopy and First Class Mail

Mr. Brad Bradley
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3590

**RE: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree
Voluntary Progress Report 11 (March 2000)**

Dear Mr. Bradley:

As requested by the U.S. Environmental Protection Agency ("EPA"), two copies of this letter are submitted on behalf of the NL Industries/Taracorp Superfund Site Group ("Group") on a voluntary basis to provide EPA with a progress report for activities related to the remediation of the residential lots and remote fill areas, the remediation of the Taracorp pile, and the remedial design for groundwater that were performed in regard to the NL Industries/Taracorp Superfund Site (the "site") during March 2000.

1. Actions Taken During Previous Month to Comply with the Consent Decree:

- During March 2000, the Group's supervising contractor, ENTACT, Inc. ("ENTACT"), remobilized to the site and resumed remedial activities related to remediation of residential lots and remote fill areas. Major tasks performed by ENTACT included remediation of six residential lots and two remote fill lots. The residential lots and remote fill lots which were remediated in March 2000 are summarized on Table 1 and Table 2, respectively. Through March 2000, ENTACT has completed remedial activities at 765 residential lots and 32 remote fill lots.
- During March 2000, ENTACT also continued with efforts related to remediation of the Taracorp pile. Except for touchup work to final grading and potential overseeding of the Taracorp pile cap, remaining remedial activities at the industrial site were completed.
- During March 2000, ARCADIS Geraghty & Miller ("ARCADIS") implemented field activities associated with the pre-design investigation for groundwater. ARCADIS personnel and Group representatives also continued efforts to secure access to off-site properties for installation and sampling of groundwater monitoring wells.



- On March 6, 2000, a progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, ENTACT, and the Group's Technical Committee. ENTACT issued a report to project participants on March 17, 2000 to document the results of the meeting.
- On March 6, 2000, the Group's project coordinator issued a voluntary progress report to EPA.
- On March 8, 2000, ARCADIS personnel met with Mr. Carl Cannon, National Steel Corporation, to inspect proposed monitoring well locations. During the meeting, Mr. Cannon requested that the monitoring wells GMMW-116 be relocated to adjacent railroad property.
- On March 9, 2000, the Group's project coordinator issued a letter and signed access agreement to Mr. Willie R. Foster for installation and sampling of a groundwater monitoring well on Earle Street in Madison, Illinois.
- On March 9, 2000, the Group's project coordinator issued a letter and signed access agreement to Ms. Sara B. Page-Collins, Eagle Park Acres Imp. Assn., for installation and sampling of a groundwater monitoring well on Hill Street in Madison, Illinois.
- During the week of March 12, 2000, ENTACT remobilized personnel and equipment to the site to resume activities associated with remediation of residential lots, remediation of remote fill areas, and miscellaneous activities at the main industrial site.
- On March 20, 2000, the Group's project coordinator issued a letter to EPA to confirm that groundwater monitoring well development activities were completed on March 18, 2000 at those properties where access had been obtained and that groundwater sampling activities would begin on March 20, 2000.
- On March 24, 2000, ARCADIS personnel completed the collection of groundwater samples from existing and newly installed monitoring wells at the main industrial site and off-site areas where access had been obtained. Samples were submitted to the laboratory for analysis.
- On March 27, 2000, a weekly progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, the Army Corps of Engineers, ENTACT, and the Group's Technical Committee. ENTACT issued a report to project participants on April 3, 2000 to document the results of the meeting.

- On March 29, 2000, ARCADIS personnel discussed potential alternate locations for installation of monitoring well GMMW-116 with Mr. Cannon, National Steel Corporation. During the meeting, Mr. Cannon confirmed that monitoring well GMMW-116 would need to be relocated to adjacent railroad property.
- On March 29, 2000, ARCADIS personnel issued a revised access agreement to Mr. Cannon to reflect the revised locations for proposed monitoring well installation.
- On March 31, 2000, ARCADIS personnel issued a letter to EPA to provide a comprehensive summary of the efforts undertaken by ARCADIS and the Group to secure access to off-site properties for installation of monitoring wells.
- On March 31, 2000, ARCADIS representatives issued an access agreement to Terminal Railroad Association of St. Louis to request access for installation of proposed monitoring well GMMW-116.

2. **Summary of Data and/or Results of Sampling and Tests Received:**

- Not applicable for this reporting period.

3. **Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Month:**

- Not applicable for this reporting period.

4. **Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- At the present time, the Group anticipates that ENTACT will complete remaining field activities associated with remediation of residential lots, remote fill lots, and the Taracorp pile. After those activities (including Slough Road, street sweeping, and other tasks) have been completed, ENTACT will demobilize its equipment and personnel from the site. ENTACT will initiate efforts to prepare final reports to summarize the remedial activities which were performed at the site.
- ARCADIS personnel will continue to perform predesign field investigation activities for groundwater at those properties for which access has been obtained. Laboratory data from groundwater sampling completed on March 24, 2000 will be received, provided and discussed with EPA, and validated.

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- ARCADIS personnel and representatives of the Group's Technical Committee will continue efforts to secure access to off-site properties for installation and sampling of groundwater monitoring wells. EPA will be advised of the Group's continuing efforts.
- ARCADIS personnel will continue efforts to revise the Predesign Investigation Work Plan for Groundwater to address EPA's comments. Finalization of the Predesign Investigation Work Plan has been delayed pending resolution of access issues associated with the proposed monitoring well installations and confirmation of final locations for the new wells.

5. **Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- As noted above, the Group and ARCADIS have encountered difficulties in securing access to properties for installation of monitoring wells. ARCADIS personnel issued a letter to EPA on March 31, 2000 to document efforts to secure access. The current status of the Group's efforts to secure access is summarized in Table 3.

6. **Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

7. **Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- Not applicable for this reporting period. If requested by EPA, the Group and ENTACT will support EPA's efforts to hold a media event at the site in May 2000.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.



Jeffrey A. Leed
Project Coordinator

attachment

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cc: Mr. Bob Rogers, Illinois EPA (w/attachment, by first class mail)
Mr. Tim Healy - ENTACT, Inc. (w/attachment, by first class mail)
Mr. Nicholas Valkenburg - ARCADIS Geraghty & Miller
(w/attachment, by first class mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group
(w/attachment, by first class mail)

TABLE 1
RESIDENTIAL LOTS

Weekly Progress Report - Activities Through 4/4/2000

	Lot #	Street	Depth	Backfill Crew	Soil Removal	Backfill	Stone
760	1731	Maple	6		3/14/2000	3/27/2000	3/27/2000
761	2005	Bryan	12		3/17/2000	3/27/2000	3/27/2000
762	1821	Edison	6		3/17/2000	3/24/2000	3/24/2000
764	2021	Edwardsville	12		3/21/2000	3/28/2000	3/28/2000
765	2448	Edison	6		3/21/1999	3/30/2000	3/30/2000
766	1315	Iowa	6		3/29/1999	3/31/2000	3/31/2000

TABLE 2
REMOTE FILL LOTS

Progress Report - Activities Through 4/4/2000

	Lot # Street	Soil Removal	Backfill	Stone
31	214 1/2 Hill	3/20/2000	3/31/2000	N/A
32	312 Terry	3/21/2000	3/31/2000	N/A

TABLE 3

NL INDUSTRIES/TARACORP SUPERFUND SITE

STATUS OF ACCESS TO PROPERTIES FOR PREDESIGN INVESTIGATION FOR GROUNDWATER

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 101		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 102		✓	Off-site (east of main industrial)		Aetna Freight Lines Inc. 1501 Grand Granite City, IL 62040		Property owner recently identified. Access agreement to be prepared.
MW 103		✓	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 103-91		✓	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 104		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 104-92		✓	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 105D		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.

Table 3 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

April 7, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 105S		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 106 D		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 106 S		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 107 D		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 107 S		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 108 D		✓ (not located during site visit)	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.

Table 3 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

April 7, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 108 S		✓ (not located during site visit)	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 109		✓ (not located during site visit)	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 109-92		✓ (not located during site visit)	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 110		✓ (not located during site visit)	Off-site (northeast of main industrial)		Not known		
MW 111-92		✓ (not located during site visit)	Off-site (northeast of main industrial)		Not known		
MW 108 X	✓		Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 109 X	✓		Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.

Table 3 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

April 7, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 112	✓		Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
GMMW-113	✓		Main industrial (opposite side of State Street from State Street Warehouse)	22-2-19-24-15-401-006 22-2-19-24-15-401-007	John G. Obucina 1460 State Street Granite City, IL 62040	John G. Obucina 15th & State Streets Granite City, IL 62040	Access agreement issued on 12/17/99.
GMMW-113	✓						Access agreement issued to the City of Granite City in January 2000. Approval (right-of-way permit) has been obtained from Granite City for well installation
GMMW-114	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access to be incorporated into access agreement sent to National Steel Corp. on 12/17/99. Based upon discussions with Mr. Carl Cannon, National Steel Corp., a revised access agreement was sent to Mr. Cannon on 3/29/00.
GMMW-115	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access to be incorporated into access agreement sent to National Steel Corp. on 12/17/99. Based upon discussions with Mr. Carl Cannon, National Steel Corp., a revised access agreement was sent to Mr. Cannon on 3/29/00.

Table 3 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

April 7, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
GMMW-116	✓		Main industrial		Terminal Railroad Assoc. of St. Louis 700 North Second Street St. Louis, MO 63102		Based upon discussions with Mr. Carl Cannon, National Steel Corp., the proposed monitoring well was located to adjacent property. An access agreement was sent to the Terminal Railroad Association of St. Louis on 3/31/00.
GMMW-117	✓		Venice Township	21-1-19-25-00-000-009	Bissell Street Warehouse Co. 1226 Bissell Avenue Venice, IL 62090	Bissell Street Warehouse Co. Highway 3/P.O. Box C Madison, IL 62060	Access agreement issued on 12/17/99. Access agreement signed by Brian Kearns, Bissell Street Warehouse Co., on 12/31/99.
GMMW-118	✓		Venice Township	21-2-19-35-15-401-906.000	Gulf Mobile Ohio RR Kerr Street Venice, IL 62090	Illinois Cental RR 455 North Cityfront Plaza Dr. Chicago, IL 60611	Access agreement issued on 12/17/99.
GMMW-118	✓		Venice Township		Right-of-way on south side of Kerr Street (approx. 200 feet east of intersection of Kerr Street and Main Street)	City of Venice, City Council c/o Mayor Tyrone Echols Venice City Hall Broadway & Kline Venice, IL 62090	Access agreement hand-delivered to Mayor Tyrone Echols, City of Venice, and city attorney on 1/25/00. On 2/29/00, the City of Venice authorized well installation at a city council meeting.
GMMW-119	✓		Venice Township	21-2-19-35-00-000-011.T00 21-2-19-35-00-000-012.T00	Madison IL & St. Louis Ry Co. 4th Street Venice, IL 62090	Madison IL & St. Louis Ry Co. 4th Street Venice, IL 62090	Access agreement issued on 12/17/99.

Table 3 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

April 7, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
GMMW-119	✓		Venice Township		Right-of-way on the east side of 4 th Street (approximately 100 feet south of intersection of 4 th Street and Granville Street)	City of Venice City Council c/o Mayor Tyrone Echols Venice City Hall Broadway & Kline Venice, IL 62090	Access agreement hand-delivered to Mayor Tyrone Echols, City of Venice, and city attorney on 1/25/00. On 2/29/00, City of Venice authorized well installation at city council mtg.
GMMW-120	✓		Eagle Park Acres	21-1-19-36-08-201-004	Eagle Park Acres Imp. Assn Hill Street Madison, IL 62060	Eagle Park Acres Imp. Assn. P.O. Box 385 Madison, IL 62060	Access agreement issued on 12/17/99. A signed access agreement received from Sarah B. Page-Collins 1/31/00. Also, a right-of-way permit authorization for monitoring well installation has been received from Madison County Highway Department.
GMMW-121	✓		Eagle Park Acres	21-2-19-36-16-401-036	Bobby L. & Verlillian Ervin 214 Watson Street Madison, IL 62060	Bobby L. & Verlillian Ervin 212 Watson Street Madison, IL 62060	Access agreement issued on 12/17/99.
					Northern parkway of Mary Street, south of Watson Street		A right-of-way permit authorization for monitoring well installation has been received from the Madison County Highway Department.
GMMW-122	✓		Eagle Park Acres	21-2-19-36-12-202-008	Willie R. Foster Earle Street Madison, IL 62060	Willie R. Foster 306 Terry Street Madison, IL 62060	Access agreement issued on 12/17/99. A signed access agreement was received on 1/28/00.
					Northwest side of Earle Street, south of Allen Street		A right-of-way permit authorization for monitoring well installation has been received from the Madison County Highway Department.

Table 3 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

April 7, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
GMMW-123	✓		Main industrial	21-2-19-25-07-201-014	Martin and Baily, Inc. Madison Avenue Madison, IL 26060	Martin and Bailey, Inc. P.O. Box 385 Carmi, IL 62821	Access agreement issued on 12/17/99. Access agreement signed by Mark Bayley, Martin and Baily, Inc., on 12/24/99.
					Northside of 12th Street between Madison and Iowa Streets and alley between Madison and Iowa Streets, north of 12th Street, 200 feet		Access agreement hand-delivered on 1/11/00. City of Madison City Council has approved the request for access to the public right-of-way. A written agreement/permit is not required, but the building inspector must be contacted prior to drilling.
GMMW-124 GMMW-125	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access agreement issued on 12/17/99. Based upon discussions with Mr. Carl Cannon, National Steel Corp., a revised access agreement was sent to Mr. Cannon on 3/29/00.